



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

September 11, 2001

Browning Ferris Industries of CA, Inc.
Ox Mountain Sanitary Landfill
12310 San Mateo Road
Half Moon Bay, CA 94019

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Vice-Chairperson)
Nate Miley
Shelia Young

Attention: Mr. Lochlin Caffey
Environmental Manager

Application Number: 17439
Plant Number: 2266
Equipment Location: Ox Mountain Sanitary Landfill
12310 San Mateo Road
Half Moon Bay, CA 94019

CONTRA COSTA
COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema

Dear Mr. Caffey:

MARIN COUNTY
Harold C. Brown, Jr.

Our August 15, 2001 letter that responded to your April 17, 2001 public comment letter contained an error. The response concerning Condition # 10164, Part 18 erroneously described changes to Condition # 17309, Part 34 for the Keller Canyon Landfill (Plant # 4618) instead of the proposed condition changes for Part 18. The correct response and permit condition revisions are shown on the following page.

NAPA COUNTY
Brad Wagenknecht

As you requested in your recent telephone conversation with Carol Allen, the District has also corrected the source description for S-1 by changing the source name from "Browning-Ferris Industries of CA, Inc." to "Los Trancos Canyon Landfill". The revisions to Sections II, IV, VI, and VII are shown on the attached pages.

SAN FRANCISCO
COUNTY
Chris Daly
Tony Hall
Leland Yee

I apologize for any confusion these errors may have caused. If you have any further questions, please call me at (415) 749-4704 or your Permit Engineer, Carol Allen, at (415) 749-4702.

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Secretary)

Very truly yours,

SANTA CLARA COUNTY
Randy Attaway
(Chairperson)
Liz Kniss
Julia Miller
Dena Mossar

William deBoisblanc
William deBoisblanc
Director, Permit Services Division

SOLANO COUNTY
William Carroll

Cc: Mr. Jim Gunderson
BFI – Ox Mountain Sanitary Landfill
12310 San Mateo Road
Half Moon Bay, CA 94019

SONOMA COUNTY
Tim Smith
Pamela Torliatt

WDB:CSA:csa

Ellen Garvey
EXECUTIVE OFFICER/
AIR POLLUTION
CONTROL OFFICER

Response to Comments on Permit Conditions

Condition # 10164, Part 18:

Regulation 9-1-302 contains a general requirement limiting the concentration of sulfur dioxide to less than 300 ppm on a dry basis. You are correct in saying that the rule does not require monitoring for the general requirement. As was explained above in the response to general comments, monitoring for limits where the applicable requirement contains no monitoring is required by the 40 CFR, Part 70 regulations.

However, the District agrees to reduce the monitoring frequency from a weekly basis to a quarterly basis in accordance with the suggested monitoring frequency in the CAPCOA/ARB/EPA agreement.

18. The concentration of total reduced sulfur compounds in the collected landfill gas shall not exceed 92 ppmv as H₂S. Total reduced sulfur compounds in the collected landfill gas shall be monitored as a surrogate for monitoring sulfur dioxide in control systems exhaust. In order to demonstrate compliance with this part, the Permit Holder shall measure the total sulfur content in collected landfill gas on a ~~weekly~~quarterly basis using a draeger tube. The landfill gas sample shall be taken from the main landfill gas header. The Permit Holder shall follow the manufacturer's recommended procedures for using the draeger tube and interpreting the results. The Permit Holder shall conduct the first draeger tube test no later than 3 months after the issue date of the MFR Permit and ~~weekly~~quarterly thereafter. ~~After collecting 3 months of landfill gas sulfur content data, the Permit Holder may reduce the sulfur content testing frequency to a monthly basis, if all tests indicate compliance with the above limit. After collecting one year of sulfur content data, the Permit Holder may reduce the sulfur content testing frequency to a quarterly basis, if all tests indicate compliance with the above limit. [Basis: Cumulative Increase, RACT, 9-1-302 and Regulation 2-6-503]~~

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition J. and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
1	Browning-Ferris Industries of CA, Inc. Los Trancos Canyon Landfill: (Active Solid Waste Disposal Site with Active Gas Collection System)	Accepting MSW, agricultural waste, demolition waste, auto and tire waste, sewage sludge, and asbestos.		Max. Design Capacity (waste and cover, excluding final cover) = 49.0 E6 yd ³ (37.5 E6 m ³) Max. Waste Acceptance Rate = 3598 tons/day Max. Cumulative Waste In-Place = 22.74 million tons (20.6 million Mg)
	Upper Canyon	Vertical Wells		76 wells
	Lower Canyon	Vertical Wells Horizontal Collectors		15 wells 21 collectors (2 headers)
5	Non-Retail Gasoline Dispensing Facility G#8524 (Phase I is Coaxial, Phase II is Vapor Balance)	1 Gasoline Nozzle 1 Gasoline Tank 2 Diesel Tanks (exempt) 2 Diesel Nozzles (exempt)	OPW 11V Above-ground Above-ground EMCO Wheaton A845 and WOG 600	10 gpm 1000 gallon capacity 1000 gallon capacity and 10,000 gallon capacity 8 gpm and 35.3 gpm

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements. All other text may be found in the regulations themselves.

Table IV – A
Source-specific Applicable Requirements
S1 - ~~BROWNING-FERRIS INDUSTRIES OF CA, INC.~~ LOS TRANCOS CANYON LANDFILL

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (10/7/98)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
1-523.1	Reporting requirement for periods of inoperation > 24 hours	Y	
1-523.2	Limit on duration of inoperation	Y	
1-523.3	Reporting requirement for violations of any applicable limits	Y	
1-523.4	Records of inoperation, tests, calibrations, adjustments, & maintenance	Y	
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-401	Appearance of Emissions	Y	

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable

Condition # 7523

For S-5, NON-RETAIL GASOLINE DISPENSING FACILITY

Pursuant to BAAQMD Toxic Section Policy, this facility's annual gasoline throughput shall not exceed 400,000 gallons in any consecutive 12-month period. (Basis: Toxic Risk Management Policy)

Condition # 10164

For S-1, ~~BROWNING-FERRIS INDUSTRIES OF CA, INC. LOS TRANCOS CANYON LANDFILL~~; A-4, MODIFIED LANDFILL GAS FLARE; A-5, REPLACEMENT LANDFILL GAS FLARE; AND A-6, NEW LANDFILL GAS FLARE:

Plant 2266, Last Amended 2/18/00 per Application #380
Conditions for S-1

- *1 Landfill operations at the Los Trancos Canyon (Ox Mountain) Landfill (S-1), including the acceptance and placement of waste, earthmoving, and construction activities, shall be restricted to six days per week, Monday through Saturday. [Basis: CEQA]
- 2 Total waste accepted and placed at the Los Trancos Canyon Landfill (S-1) shall not exceed 835,000 tons during any consecutive twelve-month period; nor 3,598 tons during any one day. The total cumulative amount of all wastes placed in the landfill shall not exceed 22,740,000 tons. The maximum design capacity of S-1 (total volume of all wastes and cover materials placed in the landfill, excluding final cover) shall not exceed 49,000,000 cubic yards. To confirm compliance with this part, the Permit Holder of S-1 shall maintain daily records, summarized on a monthly basis, of the amount of waste accepted and placed in each area of the landfill. [Basis: Cumulative Increase]
- *3 All waste shall be covered with compacted materials meeting the requirements of the State of California. The cover frequency shall be increased as necessary

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S1 – ~~BROWNING-FERRIS INDUSTRIES OF CA, INC.~~ LOS TRANCOS CANYON LANDFILL

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Collection System Installation Dates	BAAQMD 8-34-304.1	N		For Inactive/Closed Areas: collection system components must be installed and operating by 2 years + 60 days after initial waste placement	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 10164, Part 13, subparts a.-e.	P/E	Records
Collection System Installation Dates	BAAQMD 8-34-304.2	N		For Active Areas: Collection system components must be installed and operating by 5 years + 60 days after initial waste placement	BAAQMD 8-34-501.7 and 501.8 and BAAQMD Condition # 10164, Part 13, subparts a.-e.	P/E	Records